REMARKS

Claim 7 has been amended. Claims 7, 10-14, 18-23 and 25 remain for further consideration. No new matter has been added.

The objections and rejections shall be taken up in the order presented in the Official Action.

1-11. Claims 7, 10, 12, 14, 18 and 20 currently stand rejected as allegedly being obvious in view of the combined subject matter in U.S. Patent 6,101,499 to Ford (hereinafter "Ford") and U.S. Patent 5,371,868 to Koning (hereinafter "Koning").

CLAIM 7

A Prima Facie Case of Obviousness Has Not Been Established

The Official Action contends that Ford discloses all of the features of claim 7, except the feature of "*manipulating the first address by mathematically summing the first address with a predetermined number, the sum representing the second address.*" (Official Action pg. 3). The Official Action further contends that "*Koning is directed towards an addressing system for dynamically generating a second address for a device in a first network where the device has a first address, the second address representing the device's address in a second network. To this end, Koning discloses manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address and the predetermined number.*" (Official Action pg. 3). The Official Action recognizes that "*Ford is also directed towards dynamically generating addresses for devices but lacks Koning's ability to calculate multiple addresses for different networks from a single*

address." (Official Action, pgs. 3-4). The Official Action concludes that "*it would have been obvious to one of ordinary skill in the art to incorporate Koning's address generation functionality into Ford's scheme.*" (Official Action pg. 4). The reasons given in the Official Action are that "*[s]uch a combination would supplement and improve Ford's system by enabling another method of deriving from a single address a plurality of unique network addresses for devices to interact in a plurality of networks.*" (Official Action pg. 4).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in Ford and Koning to combine the teachings of Ford and Koning to meet the features of claim 7. That is, the broad statement in the Official Action mentioned above that Koning combined with Ford would supplement Ford's system by enabling another method of deriving from a single address a plurality of unique network addresses for devices to interact in a plurality of networks does not constitute any suggestion or motivation to combine the two references to meet all of the features of claim 7.

Specifically, Koning discloses a networking addressing scheme for deriving a single address for a network device from stored address information relating to other network devices. Koning deals with the problem of uniquely addressing each of a plurality of devices within one or more networks using a single address per device. Koning contends that prior art techniques utilized a dedicated read-only memory ("ROM") chip for storage of each physical address of a central logic unit and of the corresponding ports of a network bridge. This resulted in a plurality of ROM chips, which led to undesirable issues of cost, physical space and power consumption. (col. 1, line 21 through col. 2, line 9). Koning's solution is to reduce the number of ROM chips and instead use a single ROM chip that stored one or two address values pertaining to one or two

network devices. Koning then derives, from these stored address values, the additional physical address values needed to identify each of the remaining devices in the one or more networks. Throughout Koning, a single address is generated for each network device. Koning does not disclose or suggest how to derive a second address from a first address for a single device, where the first address identifies the device in the first network and where the second address identifies the device in the second network, as in the present claimed invention. Indeed, there is no teaching or suggestion whatsoever in Koning that a network device can have more than one address, let alone have more than one address where each address corresponds to the same device as viewed in different networks.

Koning is in marked contrast to Ford in that Ford deals with the problem of assigning a plurality of addresses to a device so that the device can be identified in a corresponding plurality of networks. As alleged in the Official Action, Koning purports to solve this problem by disclosing an addressing system for dynamically generating a second address for a device in a first network where the device has a first address, the second address representing the device's address in a second network. However, this is incorrect because, as discussed above, there is no teaching or suggestion whatsoever in Koning that a network device can have more than one address assigned thereto.

Thus, in Ford, a single network device has a plurality of addresses, whereas in Koning a single network device only has a single address. Thus, the problems addressed in Ford and Koning along with the resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of Ford and Koning to meet the features of claim 7. Therefore, it is respectfully submitted that the

Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 7 should be removed and claim 7 should be passed to issuance.

Assuming, however, for the moment, without admitting that Ford and Koning are even properly combinable, it is respectfully submitted that a combination of Ford and Koning does not meet the all of the features of claim 7. This is because, as discussed above, Koning fails to disclose or suggest the generation of more than one address for each network device.

As a result, it is submitted that the obviousness rejection of claim 7 is moot and should be removed, and that claim 7 is in condition for allowance and should be passed to issuance.

Claim 14

As claim 14 currently stands rejected for the identical reasons as claim 7, the arguments above with respect to claim 14 are equally applicable to claim 14. As a result, it is respectfully requested that the obviousness rejection with respect to claim 14 is moot, and that claim 14 is in condition for allowance and should be passed to issuance.

12-15. Claims 11 and 19 currently stand rejected as allegedly being obvious in view of the combined subject matter in Ford, Koning and the MOST Specification Framework Rev. 1.1 ["MOST spec"] (hereinafter "the MOST Specification").

As claims 11 and 19 depend from claims 7 and 14, respectively, which are patentable for at the reasons specified above, it is respectfully submitted that the obviousness rejection of claims 11 and 19 is moot, and that claims 11 and 19 are in condition for allowance and should be passed to issuance.

16-19. Claims 13 and 21 currently stand rejected as allegedly being obvious in view of the combined subject matter in Ford, Koning, the MOST Specification and U.S. Patent 6,163,843 to Inoue (hereinafter "Inoue").

As claims 13 and 21 depend from claims 7 and 14, respectively, which are patentable for at the reasons specified above, it is respectfully submitted that the obviousness rejection of claims 13 and 21 is moot, and that claims 13 and 21 are in condition for allowance and should be passed to issuance.

20-23. Claim 22 currently stands rejected as allegedly being obvious in view of the combined subject matter in the MOST Specification, Ford and Koning.

A Prima Facie Case of Obviousness Has Not Been Established

The Official Action contends that the MOST Specification discloses certain features of claim 22, except the feature of "*each of said plurality of multimedia devices has associated therewith a second address that uniquely identifies each said multimedia device in a public network, wherein the second address is derived by mathematically summing a predetermined number to the corresponding first address such that each second address is the sum of the first address and the predetermined number and that each second address is different than the corresponding first address.*" (Official Action pg. 7). Further, the Official Action contends that Ford discloses certain features of claim 22, except the feature of "*mathematically summing to create the second address.*" (Official Action pg. 7). The Official Action further contends that "*Koning is directed towards an addressing system for dynamically generating a second address for a device in a first network where the device has a first address, the second address*

representing the device's address in a second network. To this end, Koning discloses manipulating a first address of a device by mathematically summing a predetermined number and the first address to derive the second address which is the sum of the first address and the predetermined number." (Official Action pg. 8). The Official Action recognizes that "*Ford is also directed towards dynamically generating addresses for devices but lacks Koning's ability to calculate multiple addresses for different networks from a single address.*" (Official Action, pg. 8). The Official Action concludes that "*it would have been obvious to one of ordinary skill in the art to incorporate Koning's address generation functionality into Ford's scheme.*" (Official Action pg. 8). The reasons given in the Official Action are that "*[s]uch a combination would supplement and improve Ford's system by enabling another method of deriving from a single address a plurality of unique network addresses for devices to interact in a plurality of networks.*" (Official Action pg. 8). The Official Action further contends that "*Koning's invention is commensurate with the goals of the MOST network. Koning desires to enable a device to interact in a plurality of networks with a variety of addresses mathematically derived from a single address [see Koning, column 1 <<lines 11-19>> | claim 6]. The combination of Koning, Ford and the MOST spec would create a dynamic network addressing scheme that enables unique addressing of network devices in vehicles.*" (Official Action pg. 8).

However, it is respectfully submitted that the Official Action has not made out a *prima facie* showing of obviousness. This is because there is no suggestion or motivation whatsoever in the MOST Specification, Ford and Koning to combine the teachings of the MOST Specification, Ford and Koning to meet the features of claim 22. That is, the broad statement in the Official Action mentioned above that Koning combined with Ford would supplement Ford's system by enabling another method of deriving from a single address a plurality of unique

network addresses for devices to interact in a plurality of networks does not constitute any suggestion or motivation to combine the two references to meet all of the features of claim 22.

Specifically, Koning discloses a networking addressing scheme for deriving a single address for a network device from stored address information relating to other network devices. Koning deals with the problem of uniquely addressing each of a plurality of devices within one or more networks using a single address per device. Koning contends that prior are techniques utilized a dedicated read-only memory ("ROM") chip for storage of each physical address of a central logic unit and of the corresponding ports of a network bridge. This resulted in a plurality of ROM chips, which led to undesirable issues of cost, physical space and power consumption. (col. 1, line 21 through col. 2, line 9). Koning's solution is to reduce the number of ROM chips and instead use a single ROM chip that stored one or two address values pertaining to one or two network devices. Koning then derives, from these stored address values, the additional physical address values needed to identify each of the remaining devices in the one or more networks. Throughout Koning, a single address is generated for each network device. Koning does not disclose or suggest how to derive a second address from a first address for a single device, where the first address identifies the device in the first network and where the second address identifies the device in the second network, as in the present claimed invention. Indeed, there is no teaching or suggestion whatsoever in Koning that a network device can have more than one address, let alone have more than one address where each address corresponds to the same device as viewed in different networks.

Koning is in marked contrast to Ford in that Ford deals with the problem of assigning a plurality of addresses to a device so that the device can be identified in a corresponding plurality of networks. As alleged in the Official Action, Koning purports to solve this problem by

disclosing an addressing system for dynamically generating a second address for a device in a first network where the device has a first address, the second address representing the device's address in a second network. However, this is incorrect because, as discussed above, there is no teaching or suggestion whatsoever in Koning that a network device can have more than one address assigned thereto.

Thus, in Ford, a single network device has a plurality of addresses, whereas in Koning a single network device only has a single address. Thus, the problems addressed in Ford and Koning along with the resulting solutions disclosed in each reference are significant, and not mere trivial, distinctions between the two references. So much so that, as a result, it is respectfully submitted that no reasonable justification exists for the alleged combination of the MOST Specification, Ford and Koning to meet the features of claim 22. Therefore, it is respectfully submitted that the Official Action has not made out a *prima facie* case of obviousness and, as such, the rejection of claim 22 should be removed and claim 22 should be passed to issuance.

Assuming, however, for the moment, without admitting that the MOST Specification, Ford and Koning are even properly combinable, it is respectfully submitted that a combination of the MOST Specification, Ford and Koning does not meet the all of the features of claim 22. This is because, as discussed above, Koning fails to disclose or suggest the generation of more than one address for each network device. In particular, the contention in the Official Action noted above for the combination of the MOST Specification, Ford and Koning that "*Koning's invention is commensurate with the goals of the MOST network. Koning desires to enable a device to interact in a plurality of networks with a variety of addresses mathematically derived from a single address*" is factually incorrect.

As a result, it is submitted that the obviousness rejection of claim 22 is moot and should be removed, and that claim 22 is in condition for allowance and should be passed to issuance.

24-27. Claims 23 and 25 currently stand rejected for allegedly being obvious in view of the combined subject matter disclosed in the MOST Specification, Ford, Koning and Inoue.

As claims 23 and 25 depend from claim 22, which is patentable for at the reasons specified above, it is respectfully submitted that the obviousness rejection of claims 23 and 25 is moot, and that claims 23 and 25 are in condition for allowance and should be passed to issuance.

For all the foregoing reasons, reconsideration and allowance of claims 7, 10-14, 18-23 and 25 is hereby respectfully requested.

If a telephone interview could assist in the prosecution of this application, please call the undersigned attorney.

Respectfully submitted,

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